

KAROLINA OBRYCKA, ET AL. V. CITY OF CHICAGO, ET AL.
FEDERAL COURT NUMBER: 07 C 2372

Exhibit B

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May 29, 2008

Via facsimile, E-Mail and first-class mail

Barrett Elizabeth Rubens
Office of the Corporation Counsel
30 North LaSalle Street, Suite 1720
Chicago, IL 60602

Our File No.
1830.000

RE: Karolina Obrycka, et al. v. City of Chicago, et al.
Federal Court Number: 07 C 2372

Writer's Direct Dial No.
(630) 654-9975

Writer's E-mail Address:
pprovenzale@eklwilliams.com

Dear Ms. Rubens:

I am in receipt of your e-mail of 4:14 p.m. today. I am not sure you really appreciate the issue I have with depositing an armed adverse witness. The location of the deposition is really immaterial, and your persistence in offering an alternative location for the deposition of an armed adverse witness does not eliminate the part about him being armed.

What is clear in my mind is that you are using a frivolous issue, about which no reasonable person could disagree that you are flat out wrong, to leverage relocating the depositions to your own offices.

I have to tell you, I take personal offense to you placing my safety at the fulcrum of the leverage you are trying to exert, as well as that of my clients and all of the other attorneys in this case who may be adverse to your officer witnesses, by playing these games to manipulate where the depositions will proceed. Given your clear expression in your e-mail of this purpose, I am withdrawing any proposal to depose Officer Skala anywhere but in my office. I will not permit you to manipulate the manner and progress of our discovery in this case any further.

In hindsight now I see it was a mistake to attempt to be accommodating with Ms. McInnis in offering the concession of relocating Officer Skala's deposition to your offices, when the reason why it did not proceed was entirely the fault of you and your co-counsel's continuing late disclosures and obstructionist positions. Therefore, I demand that you provide me with alternative dates for Detective Skala's deposition to proceed in my offices on either July 11, 12, 22 or 29, which are dates already set aside by all counsel. Inform me immediately if you are refusing to produce him.

Finally, as to the issue of the guns at depositions, that matter will be before the Court soon enough.

Sincerely,
EKI WILLIAMS PLLC

Patrick L. Provenzale

PLP/mn

cc.

Counsel of Record, Via E-mail and Regular Mail
See attached Service List

SERVICE LIST

RE: Karolina Obrycka, et al. v. City of Chicago, et al.
Court Number: 07 C 2372
Our File Number: 1830.000

Notice will be electronically mailed to:

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